

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

CERTIFICATION OF JESSICA DAVIDSON

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively, the “ZHP defendants”). I make this Certification based on personal knowledge and in support of the ZHP defendants’ Motion for Leave to File Their Second Amended Answer and Affirmative Defenses.

2. Attached hereto as Exhibit 1 is a true and correct copy of the EmblemHealth Assignment filed in *MSP Recovery Claims, Series LLC v. Liberty Mutual Insurance Co.*, No. 1:22-cv-10809-RWZ, ECF 1-9 (D. Mass. May 25, 2022).

3. Attached hereto as Exhibit 2 is a true and correct copy of the SummaCare Assignment filed in *MSP Recovery Claims Series, LLC v. Liberty Mutual Insurance Co.*, No. 1:22-cv-10928-RWZ, ECF 1-7 (D. Mass. June 14, 2022).

4. Attached hereto as Exhibit 3 is a true and accurate copy of the proposed Second Amended Answer and Affirmative Defenses of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC and Jury Demand.

5. Attached hereto as Exhibit 4 is a true and accurate copy of a version of the proposed Second Amended Answer and Affirmative Defenses of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC and Jury Demand showing in redline the proposed revisions from the First Amended Answer and Jury Demand filed by these defendants at ECF [2671](#).

Dated: March 6, 2024

Respectfully submitted,

By: /s/ Jessica Davidson

Jessica Davidson (NY Bar No. 6034748)
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*Princeton Pharmaceutical Inc., and Solco
Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 6, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson